

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ALIANZA AMERICAS, YANET DOE, PABLO  
DOE, and JESUS DOE, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of Florida, in  
his personal capacity; LAWRENCE A. KEEFE,  
Florida Public Safety Czar, in his personal capacity;  
JAMES UTHMEIER, Chief of Staff to Florida  
Governor, in his personal capacity; JAMES  
MONTGOMERIE; PERLA HUERTA; and  
VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No.  
22-11550-ADB

**MOTION FOR LEAVE TO TAKE JURISDICTIONAL DISCOVERY**

Plaintiffs Yanet Doe, Pablo Doe, and Jesus Doe (“Individual Plaintiffs”), on behalf of all those similarly situated (“Class Plaintiffs”), and Plaintiff Alianza Americas (“Alianza” and, together, “Plaintiffs”) move, by and through undersigned counsel, for leave to take limited jurisdictional discovery regarding (1) the existence of agency or similar relationships between defendants Ronald D. DeSantis, Lawrence A. Keefe, James Uthmeier, James Montgomerie, Perla Huerta, Vertol Systems Company, Inc. (together, “Defendants”), and certain non-parties and (2) certain in-forum actions that were taken in furtherance of Defendants’ scheme, but regarding which insufficient information is publicly available to attribute to any particular Defendant(s).

Pursuant to Local Rule 7.1(a), counsel for Plaintiffs have conferred with counsel for Defendants, who do not consent to the granting of the relief sought by this motion.

For the reasons stated in Plaintiffs' accompanying memorandum, Plaintiffs request that the Court grant their motion for leave to take jurisdictional discovery and any further relief as this Court deems just and warranted.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Plaintiffs request a hearing on their Motion for Leave to Take Jurisdictional Discovery.

Dated: July 4, 2024

Respectfully submitted,

/s/ Kenneth S. Leonetti

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**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify, pursuant to Local Rule 7.1(a), that I conferred with counsel for each of defendants Ronald D. DeSantis, Lawrence A. Keefe, James Uthmeier, James Montgomerie, Perla Huerta, and Vertol Systems Company, Inc. in a good faith attempt to resolve or narrow the issues presented by this motion. None of the foregoing have assented to the relief requested herein.

/s/ Kenneth S. Leonetti  
Kenneth S. Leonetti

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 4, 2024, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

/s/ Kenneth S. Leonetti  
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